

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LISA ALLEN and MISTY DALTON,

Plaintiffs,

v.

GREATBANC TRUST COMPANY,

Defendant.

Case No. 1:15-cv-03053

Honorable James B. Zagel

PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT

Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiffs Lisa Allen and Misty Dalton ("Plaintiffs") move this Court for leave to amend their Complaint. This is the first amendment sought by Plaintiffs, which is necessary to add a request for class certification. The proposed First Amended Complaint ("FAC") in both regular and redlined formats are attached to Plaintiffs' Memorandum of Law in Support as Exhibits A and B respectively. The proposed changes in the FAC are limited to adding a request for class certification, removing the request for a jury trial, revising certain allegations regarding the transactions at issue, and making minor typographical corrections and changes in verbiage.

Defendant opposes this motion.

Dated: November 4, 2016

Respectfully submitted,

/s/ Patrick Muench

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2016, the foregoing Plaintiffs' Motion for Leave to Amend Complaint has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Patrick Muench